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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
ROSARIO ZAMORA ROJO,  
LEONARDO FLORES BELTRAN, and  
SANDRO ESCOBEDO,  
  
Defendants.

CASE NO. 2:21-CR-0007-DAD

STIPULATION AND ORDER TO CONTINUE  
MOTIONS HEARING AND BRIEFING  
SCHEDULE

**STIPULATION**

By this stipulation, Plaintiff, the United States of America, by and through its attorney of record, Assistant U.S. Attorney David W. Spencer, and Defendants Rosario Zamora Rojo, Leonardo Flores Beltran, and Sandro Escobedo, by and through their attorneys of record, hereby request to continue the motions hearing set for January 13, 2025, and the accompanying briefing schedule, as follows:

1. On December 12, 2024, defendant Zamora Rojo filed pre-trial motions set for hearing on January 13, 2025. *See* ECF 591, ECF 592.
2. Based on a previous stipulation of the parties, the deadline for the government's oppositions was set for December 30, 2024, and the deadline for any reply briefs was set for January 6, 2025. *See* ECF 595.

3. The parties have been engaged in plea discussions and believe they are close to finalizing an anticipated resolution. If resolution is reached, the parties anticipate requesting a change of plea hearing on January 13, 2025.
4. On December 30, 2024, and December 31, 2024, defendants Sandro Escobedo and Leonardo Flores Beltran filed joinders in Zamora Rojo's motion to suppress filed at ECF 592. *See* ECF 602 (Escobedo joinder), ECF 603 (Flores Beltran joinder).
5. The parties hereby jointly stipulate and request that the January 13, 2025 hearing on defendants' pretrial motions (ECF 591, 592, 602, and 603) shall be continued to February 3, 2025. The parties further stipulate and request that the government's oppositions shall be due on January 20, 2025, and any replies shall be due on January 27, 2025.<sup>1</sup>

IT IS SO STIPULATED.

Dated: January 6, 2025

PHILLIP A. TALBERT  
United States Attorney

/s/ DAVID W. SPENCER  
DAVID W. SPENCER  
Assistant United States Attorney

Dated: January 6, 2025

/s/ Shari Rusk  
Shari Rusk  
Counsel for Defendant  
ROSARIO ZAMORA ROJO

Dated: January 6, 2025

/s/ Christopher Cosca  
Christopher Cosca  
Counsel for Defendant  
LEONARDO FLORES BELTRAN

<sup>1</sup> By agreeing to this briefing schedule, the government does not waive, and explicitly preserves its position that defendants' motions are untimely and should be denied on that basis alone. The Court ordered all pretrial motions to be filed by November 19, 2024. ECF 506. As the government will further argue in its opposition briefing, its position is that the defendants have not shown good cause for the untimely filing of their pretrial motions, and thus the motions should be summarily denied. *See* Fed. R. Crim. P. 12(c).

1 Dated: January 6, 2025

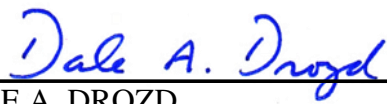
/s/ Michael Heumann  
Michael Heumann  
Counsel for Defendant  
SANDRO ESCOBEDO

8  
9 **ORDER**

10 Pursuant to the stipulation of the parties and good cause appearing, the motions hearing set for  
11 January 13, 2025, at 9:30 a.m., for the motions docketed at ECF 591, 592, 602, and 603, is hereby  
12 continued to February 3, 2025 at 9:30 a.m. The government's oppositions shall be due on January 20,  
13 2025, and any replies shall be due on January 27, 2025.

14  
15 IT IS SO ORDERED.

16 Dated: January 7, 2025

  
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DALE A. DROZD  
UNITED STATES DISTRICT JUDGE